

Joseph R. Saveri (*pro hac vice*)  
**JOSEPH SAVERI LAW FIRM, INC.**  
601 California Street, Suite 1000  
San Francisco, CA 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
jsaveri@saverilawfirm.com

Richard A. Koffman (*pro hac vice*)  
**COHEN MILSTEIN SELLERS & TOLL, PLLC**  
1100 New York Ave., N.W., Suite 500, East Tower  
Washington, DC 20005  
Telephone: (202) 408-4600  
Facsimile: (202) 408-4699  
rkoffman@cohenmilstein.com

Eric L. Cramer (*pro hac vice*)  
**BERGER & MONTAGUE, P.C.**  
1622 Locust Street  
Philadelphia, PA 19103  
Telephone: (215) 875-3000  
Facsimile: (215) 875-4604  
ecramer@bm.net

*Co-Lead Counsel for the Classes and  
Attorneys for Individual and Representative Plaintiffs  
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez,  
Brandon Vera, and Kyle Kingsbury*

[Additional counsel appear on signature page]

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon  
Vera, Luis Javier Vazquez, and Kyle  
Kingsbury on behalf of themselves and all  
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045 RFB-(PAL)

**PLAINTIFFS' STATEMENT OF  
NON-OPPOSITION TO ZUFFA, LLC'S  
MOTION TO SEAL (ECF-NO. 527)**

Zuffa LLC's Motion to Seal Plaintiffs' Motion to Certify Class and Related Materials (ECF No. 527, the "Motion to Seal") asks the Court to seal documents that have been designated CONFIDENTIAL or HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY by Zuffa or third parties, and portions of documents that refer to such documents and information, including Plaintiffs' Motion to Certify Class (ECF No. 518) and expert reports. Zuffa seeks to seal these documents on the basis that they purportedly contain highly confidential and commercially sensitive information. Motion to Seal, at 3-5. Plaintiffs take no position at this time as to whether the documents contain highly confidential or commercially sensitive information, and do not oppose sealing the documents on the limited basis that they have been designated CONFIDENTIAL or HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY by Zuffa or third parties pursuant to Section 5 of the Revised Stipulation and Protective Order (the "Protective Order"), signed by Magistrate Peggy A. Leen in this litigation on February 10, 2016. ECF No. 217. However, Plaintiffs reserve their right to challenge any CONFIDENTIAL or HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY designation pursuant to Section 6 of the Protective Order.

Dated: March 7, 2018

Respectfully Submitted,

JOSEPH SAVERI LAW FIRM, INC.

By: /s/Kevin E. Rayhill  
Kevin E. Rayhill

Joseph R. Saveri (admitted *pro hac vice*)  
Joshua P. Davis (admitted *pro hac vice*)  
Jiamin Chen (admitted *pro hac vice*)  
Kevin E. Rayhill (admitted *pro hac vice*)  
JOSEPH SAVERI LAW FIRM, INC.  
601 California Street, Suite 1000  
San Francisco, CA 94108  
Phone: (415) 500-6800/Fax: (415) 395-9940  
jsaveri@saverilawfirm.com  
jdavis@saverilawfirm.com  
jchen@saverilawfirm.com  
krayhill@saverilawfirm.com

*Co-Lead Counsel for the Classes and Attorneys for Individual and Representative Plaintiffs* *Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Brandon Vera, and Kyle Kingsbury*

*Additional Co-Lead Counsel for the Classes and Attorneys  
for Individual and Representative Plaintiffs Cung Le,  
Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Brandon  
Vera, and Kyle Kingsbury:*

Benjamin D. Brown (admitted *pro hac vice*)  
Richard A. Koffman (admitted *pro hac vice*)  
COHEN MILSTEIN SELLERS & TOLL, PLLC  
1100 New York Ave., N.W., Suite 500, East Tower  
Washington, DC 20005  
Phone: (202) 408-4600/Fax: (202) 408 4699  
bbrown@cohenmilstein.com  
rkoffman@cohenmilstein.com

Daniel H. Silverman (admitted *pro hac vice*)  
COHEN MILSTEIN SELLERS & TOLL, PLLC  
190 South LaSalle Street, Suite 1705  
Chicago, IL 60603  
Phone (312) 357-0370/Fax (312) 357-0369  
dsilverman@cohenmilstein.com

Eric L. Cramer (admitted *pro hac vice*)  
Michael Dell'Angelo (admitted *pro hac vice*)  
Patrick Madden (admitted *pro hac vice*)  
Mark R. Suter (admitted *pro hac vice*)  
BERGER & MONTAGUE, P.C.  
1622 Locust Street  
Philadelphia, PA 19103  
Phone: (215) 875-3000/Fax: (215) 875-4604  
ecramer@bm.net  
mdellangelo@bm.net  
pmadden@bm.net  
msuter@bm.net

*Liaison Counsel for the Classes and Attorneys for  
Individual and Representative Plaintiffs Cung Le, Nathan  
Quarry, Jon Fitch, Luis Javier Vazquez, Brandon Vera,  
and Kyle Kingsbury:*

Don Springmeyer  
Nevada Bar No. 1021  
Bradley S. Schrager  
Nevada Bar No. 10217  
WOLF, RIFKIN, SHAPIRO,  
SCHULMAN & RABKIN, LLP  
3556 E. Russell Road, Second Floor  
Las Vegas, Nevada 89120  
(702) 341-5200/Fax: (702) 341-5300  
dspringmeyer@wrslawyers.com  
bschrager@wrslawyers.com

*Additional Counsel For The Classes:*

Robert C. Maysey (admitted *pro hac vice*)  
Jerome K. Elwell (admitted *pro hac vice*)  
WARNER ANGLE HALLAM JACKSON &  
FORMANEK PLC  
2555 E. Camelback Road, Suite 800  
Phoenix, AZ 85016  
Phone: (602) 264-7101/Fax: (602) 234-0419  
rmaysey@warnerangle.com  
jelwell@warnerangle.com

Frederick S. Schwartz (admitted *pro hac vice*)  
LAW OFFICE OF FREDERICK S. SCHWARTZ  
15303 Ventura Boulevard, #1040  
Sherman Oaks, CA 91403  
Phone: (818) 986-2407/Fax: (818) 995-4124  
fred@fredschwartzlaw.com

William G. Caldes (admitted *pro hac vice*)  
SPECTOR ROSEMAN KODROFF & WILLIS, P.C.  
1818 Market Street – Suite 2500  
Philadelphia, PA 19103  
Phone: (215) 496-0300/Fax: (215) 496-6611  
wcaldes@srkw-law.com

John D. Radice (admitted *pro hac vice*)  
RADICE LAW FIRM, P.C.  
34 Sunset Blvd.  
Long Beach, NJ 08008  
Phone: (646) 245-8502  
jradice@radicelawfirm.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of March, 2018 a true and correct copy of **PLAINTIFFS' STATEMENT OF NON-OPPOSITION TO ZUFFA, LLC'S MOTION TO SEAL (ECF-NO. 527)** was served via the District of Nevada's ECF system to all counsel of record who have enrolled in the ECF system.

By:

/s/ Kevin E. Rayhill